



- personal telephone numbers;
- date of birth (other than year);
- names and initials of minor children; or
- sensitive health information identifiable by individual (such as an individual's medical records).

## **2. Limited Third-Party Disclosures of PCI and PSI.**

The parties and their attorneys shall take reasonable and appropriate measures to prevent the inadvertent disclosure of PCI and PSI.

The parties and their attorneys shall limit the use of PCI and PSI to the litigation of this Proceeding and shall not share or otherwise disseminate PCI or PSI to any person or entity other than the following categories of persons:

- a. The parties to this Proceeding.
- b. The parties' attorneys who have entered an appearance in this Proceeding and their staff.
- c. Court reporters and videographers employed for any on-the-record interview or hearing in this Proceeding.
- d. Persons providing copying or exhibit preparation services (including outside vendors hired to process electronically stored Documents).
- e. Consultants, experts, and their staff to the extent they are deemed to be reasonably necessary for the prosecution or defense of this Proceeding.
- f. Non-party witnesses who testify or are reasonably expected to testify at the hearing or at an on-the-record interview in this proceeding and their attorneys, on the condition that they are prohibited from disclosing or making use of any protected PCI or PSI that may be disclosed to them in the course of this Proceeding. Such witnesses and their attorneys may not retain Documents that contain PCI or PSI.
- g. The authors, originators, and addressees of Documents containing the PCI or PSI.
- h. The Office of Hearing Officers, its personnel and staff; the hearing panelists appointed in this disciplinary proceeding; FINRA's Office of General Counsel, its personnel and staff; and members of FINRA's National Adjudicatory Council.
- i. Other persons upon order of the presiding hearing officer or FINRA's Chief Hearing Officer.

Before providing PCI or PSI to persons identified in categories d, e, or f above, a party (or a party's attorney) shall provide a copy of this Protective Order to the intended recipients, and shall caution them that they must comply with this Protective Order.

This Protective Order shall not restrict the use or disclosure by a party or a party's attorney of PCI or PSI such party or attorneys obtained independently of discovery in this Proceeding (whether or not such Documents or portions of Documents were also obtained through discovery in this Proceeding) or from disclosing their own PCI or PSI as they deem appropriate.

**3. Obligations on Conclusion of Proceeding.**

Respondent or their attorneys shall within 60 days after the conclusion of this Proceeding either return to the Department of Enforcement all Documents and copies of Documents that contain PCI or PSI that the Department of Enforcement produced in this Proceeding, or certify to the Department of Enforcement that all such Documents and copies of such Documents have been securely destroyed.

Notwithstanding the foregoing, Respondent's attorneys may retain one copy of pleadings, briefs, motions, memoranda, correspondence exchanged in this Proceeding, hearing transcripts, admitted exhibits, and attorney work product created in the course of this Proceeding. All retained Documents containing PCI or PSI shall continue to be protected under this Protective Order.

**4. Applicable Law Protecting PCI and PSI.**

The parties are reminded that various state laws govern the use and dissemination of PCI and PSI. Nothing in this Order authorizes Respondent to use or disseminate Documents containing PCI or PSI in a manner inconsistent with any applicable law.

**SO ORDERED.**

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Hearing Officer

Dated: